

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

HARDEE GIRL, INC.,	:	
	:	
Plaintiff	:	
	:	
v.	:	Civil Action No.: 1:16-cv-2481-SCJ
	:	
	:	
BELLEFIT, INC.	:	
	:	
Defendant	:	
	:	Jury Trial Demanded

PLAINTIFF HARDEE GIRL INC.’S ALTERNATIVE MOTION TO
ALLOW LIMITED DISCOVERY ON THE ISSUE OF GEORGIA
CONTACTS AND/OR TO STAY PENDING RESOLUTION
OF S.D. CALIFORNIA MOTIONS

NOW COMES, Plaintiff Hardee Girl Inc. (“Hardee Girl”), through its counsel, and for the reasons set forth in its Memorandum in Opposition to Defendant Bellefit Inc.’s (“Bellefit”) Motion to Dismiss respectfully moves the Court in the alternative to allow Hardee Girl to conduct limited discovery on the limited issue of Bellefit’s contacts in the State of Georgia , or in the alternative, that this Court stay this case pending the resolution of the motion to dismiss/transfer in the California action between the same parties.

Respectfully submitted this 19th day of August, 2016

Law Offices of David Guldenschuh

By: David F. Guldenschuh
David F. Guldenschuh, Esq.
GA Bar ID No.: 315175
512 East First Street
P.O. Box 3
Rome, GA 30162-0003
Tel: 706-295-0333
Fax: 706-295-5550
dfg@guldenschuhlaw.com

Ryder, Lu, Mazzeo & Konieczny LLC

Frank A. Mazzeo, Esq.
Beth Anne Powers, Esq.
(*Pro Hac Vice* Motions Pending)
808 Bethlehem Pike, Suite 200
Colmar, PA 18915
Tel: (215) 997-0248
Fax: (215) 997-0266
fmazzeo@ryderlu.com
bpowers@ryderlu.com

Attorneys for Plaintiff

Certificate of Service

I hereby certify that on the date set forth below, a true and correct copy of the foregoing Alternative Motion for varying relief was served on the following by electronic filing:

Steven W. Hardy
SIO Law Group
3343 Peachtree Road NE, Suite 230
Atlanta, GA 30326
404-991-7304
swhardy@siolaw.com

Law Offices of David Guldenschuh

Date: August 19, 2016

By: David F. Guldenschuh
David F. Guldenschuh, Esq.
GA Bar ID No.: 315175
512 East First Street
P.O. Box 3
Rome, GA 30162-0003
Tel: 706-295-0333
Fax: 706-295-5550
dfg@guldenschuhlaw.com